

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: BP P.L.C. SECURITIES LITIGATION) MDL No. 2185
)
) Civil Action No. 4:10-md-02185
)
) Hon. Keith P. Ellison
<hr/>	<hr/>
In Re: BP ERISA LITIGATION) Civil Action No. 4:10-cv-04214
)
) Hon. Keith P. Ellison
)
)

**PLAINTIFFS' JOINT REPORT
ON PROPOSED ORGANIZATIONAL STRUCTURE**

Now come the Plaintiffs in the BP ERISA Litigation and make this Joint Report to the Court on Proposed Organizational Structure and would respectfully show the Court the following:

The BP ERISA Plaintiffs have worked diligently to resolve the competing motions to appoint lead counsel (Case No. 4:10-cv-04214, Docket Nos. 9-11 and 27-31; Case No. 4:10-mdl-2185, Docket Nos. 44-46, 67-70, 77, 81 and 83-85) and now have consent from all Plaintiffs and their counsel in the ERISA actions to propose the following organizational structure for the ERISA Plaintiffs subject to approval by this Court: The Liner Grode firm and Milberg LLP would serve as co-lead counsel with an Executive Committee consisting of Harwood Feffer LLP and Squitieri & Fearon, LLP. Ajamie LLP and The Lanier Law Firm would serve as co-liaison counsel. Plaintiffs will submit a proposed order for the Court's consideration by February 10, 2011.

DATE: February 3, 2011

Respectfully submitted,

/s/ *Thomas R. Ajamie*

Thomas Robert Ajamie
Dona Szak
John W. Clay
AJAMIE LLP
711 Louisiana, Ste. 2150
Houston, TX 77002
(713) 860-1600
Fax: (713) 860-1699

Ronald S. Kravitz
Kim S. Zeldin
LINER YANKELEVITZ SUNSHINE
REGENSTREIF LLP
199 Fremont Street, Ste. 2000
San Francisco, CA 94105
(415) 489-7700

Attorneys for Plaintiff David M. Humphries

Stephen J. Fearon , Jr. (*pro hac vice*)
Joseph Goljan (*pro hac vice*)
Olga Anna Posmyk (*pro hac vice*)
SQUITIERI & FEARON LLP
32 East 57th Street, 12th Floor
New York, NY 10022
(212) 421-6492
Fax: (212) 421-6553

Gregory M. Egleston (*pro hac vice*)
EGLESTON LAW FIRM
360 Furman Street, Ste. 443
Brooklyn, NY 11201
(646) 227-1700

Attorneys for Plaintiffs Ralph Whitley

/s/ *W. Mark Lanier*

W. Mark Lanier
Evan M. Janush (*pro hac vice*)
THE LANIER LAW FIRM
6810 FM 1960 West
Houston, TX 77069
(713) 659-5200
Fax: (713) 659-2204

Evan M. Janush (*pro hac vice*)
THE LANIER LAW FIRM
126 East 56th Street, 6th Floor
New York, NY 10022
(212) 421-2800
Fax: (212) 421-2878

Sanford P. Dumain (*pro hac vice*)
Lori G. Feldman (*pro hac vice*)
Arvind B. Khurana (*pro hac vice*)
MILBERG LLP
One Pennsylvania Plaza
New York, NY 10119
(212) 594-5300

Robert I. Harwood (*pro hac vice*)
Jeffrey M. Norton (*pro hac vice*)
Tanya Korkhov (*pro hac vice*)
HARWOOD FEFFER LLP
488 Madison Avenue, Ste. 801
New York, NY 10022
(212) 935-7400

Attorneys for Plaintiff Charis Moule, Jerry T. McGuire and Maureen S. Riely

Edwin J. Mills (*pro hac vice*)
Michael J. Klein (*pro hac vice*)
STULL, STULL & BRODY
6 East 45th Street
New York, NY 10017
(212) 687-7230

Attorneys for Plaintiff Edward F. Mineman

Robert A. Izard , Jr. (*pro hac vice*)
IZARD NOBEL LLP
29 South Main Street, Ste. 215
West Hartford, CT 06107
(860) 493-6292
Fax: (860) 493-6290

*Attorneys for Plaintiff Syed Arshadullah and
Ron Pierce*

Thomas J. McKenna (*pro hac vice*)
GAINES AND MCKENNA
295 Madison Avenue, 4th Floor
New York, NY 10017
(212) 983-1300

Attorneys for Plaintiff Thomas P. Soesman

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiffs' Joint Report on Proposed Organizational Structure has been served through the Court's electronic filing and notification system on February 3, 2011.

/s/ Thomas R. Ajamie

Thomas R. Ajamie